

FELICE JOHN VITI, Acting United States Attorney (#7007)
MARK E. WOOLF, Assistant United States Attorney (WA #39399)
Attorneys for the United States of America
Office of the United States Attorney
111 South Main Street, Suite 1800
Salt Lake City, Utah 84111-2176
Telephone: (801) 524-5682
Email: Mark.Woolf@usdoj.gov

FILED
2025 APR 25
CLERK
U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHARLES CANUPP,

Defendant.

FELONY INFORMATION

COUNT 1: 18 U.S.C. § 1343 (Wire Fraud)

Case: 2:25-cr-00177

Assigned To : Stewart, Ted

Assign. Date : 4/25/2025

Description: USA v. Canupp

The United States Attorney alleges:

I. BACKGROUND

1. Defendant CHARLES CANUPP (“CANUPP”) is a resident of Yuma County, Arizona.

2. CANUPP worked for a Utah company abbreviated as “BHI.”

II. THE SCHEME AND ARTIFICE TO DEFRAUD

3. Beginning in or around April 2024, and continuing to in or around August 2024, within the District of Utah and elsewhere,

CHARLES CANUPP,

defendant herein, devised and intended to devise a scheme to defraud BHI, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and omissions of material facts.

4. In executing and attempting to execute the scheme and artifice to defraud, and in furtherance thereof, CANUPP knowingly transmitted and caused to be transmitted wire communications in interstate commerce in violation of 18 U.S.C. § 1343 (Wire Fraud).

III. OBJECT OF THE SCHEME AND ARTIFICE TO DEFRAUD

5. It was part of the scheme and artifice to defraud for CANUPP to obtain money from BHI through false statements, misrepresentations, deception, and omissions of material facts and divert the money for his own uses.

IV. MANNER AND MEANS

6. In or around April 2024, CANUPP received approximately \$242,000 from BHI in two separate electronic funds transfers to his Wells Fargo Bank ending in xx1060. Shortly thereafter, knowing he was not entitled to the funds, CANUPP contacted BHI via an interstate wire communication promising return of the funds. Before BHI could reverse the electronic funds transfers, CANUPP wired BHI'S funds into other of his personal accounts. CANUPP obtained approximately \$128,000 for his own personal benefit and use as part of his scheme.

Count 1
18 U.S.C. § 1343
(Wire Fraud)

7. The allegations set forth in this Information are incorporated herein by reference and realleged as though fully set forth herein.

8. On or about the dates enumerated below, in the District of Utah and elsewhere,

CHARLES CANUPP,

defendant herein, for the purpose of executing and in furtherance of the scheme and artifice to defraud and to obtain money and property from BHI by means of materially false and fraudulent pretenses, representations, and promises, and omissions of material facts, caused the following to be transmitted by means of wire communication in interstate commerce:

COUNT	DATE (On or About)	WIRE COMMUNICATIONS
1.	4/29/2024	\$12,000 wire transfer from CANUPP's Arizona Wells Fargo Bank account ending in xx1060 to a personal savings account held at Social Finance ending in xx0818 in Utah.

All in violation of 18 U.S.C. § 1343.

FELICE JOHN VITI
Acting United States Attorney



MARK E. WOOLF
Assistant United States Attorney